
BULLETIN 2014-01

Extension of Transitional Policy for Non-ACA Compliant Plans

Effective April 22, 2014

On March 5, 2014, the Center for Consumer Information and Insurance Oversight (CCIIO) issued an [Insurance Standards Bulletin](#) extending CCIIO's transitional policy for two years – to policy years beginning on or before October 1, 2016, for non-grandfathered health insurance plans in the individual and small group¹ markets that would otherwise terminate or require modification as a result of the federal health insurance market reforms required under the Patient Protection and Affordable Care Act (ACA).

In light of CCIIO's extended transitional policy, insurers in Ohio may offer their insureds the ability to renew non-ACA compliant individual and small group coverage, at the insured's option, for policy years beginning on or before October 1, 2016.

Insurers wishing to extend coverage shall follow CCIIO's transitional policy, including federal notice requirements, offering reenrollment or extended coverage to impacted policyholders in the individual and/or small group market in a uniform and non-discriminatory manner in accordance with Ohio law (ORC §3924.03 and §3923.57). Thus, renewals shall be treated uniformly and without regard to health status.

Please note that individual coverage includes sickness and accident insurance made available in the individual market to individuals, with or without family members or dependents, through group policies issued to one or more associations, trusts or other entities. Small group coverage applies to only employer sponsored plans.

Filing Guidance through August 31, 2014

Through August 31, 2014, insurers electing to renew non-ACA compliant policies will have the option to file pursuant to either [Bulletin 2013-01](#) or this Bulletin. Insurers needing expedited review may file under Bulletin 2013-01, but must comply with all of the Bulletin's requirements, including limiting annualized rate increases to less than or equal to 15%. Alternatively, insurers may elect to file pursuant to this Bulletin. Although such filings will not be eligible for expedited review, insurers will not be required to meet the specific rate or form filing requirements required in Bulletin 2013-01.

During the time period that either Bulletin 2013-01 or this Bulletin remains in effect, insurers must prominently indicate via SERFF the applicable Bulletin under which the filing is being made.

¹ CCIIO's transitional policy also applies to large businesses that currently purchase insurance in the large group market, but as of January 1, 2016, will be redefined by section 1304(b) of the Affordable Care Act as small business purchasing insurance in the small group market.

Filing Guidance after August 31, 2014

After August 31, 2014, insurers wishing to extend coverage under CCIIO's transitional policy must file pursuant to this Bulletin and are not eligible for expedited review.

Superintendent of Insurance

A handwritten signature in blue ink, appearing to read "Mary Taylor". The signature is written in a cursive style with a large initial "M" and a long, sweeping tail.

Mary Taylor
Lt. Governor/Director